

# Exhibit 6

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10 Discovery Special Master  
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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

In re: KATZ INTERACTIVE CALL  
PROCESSING LITIGATION

This document relates to all cases in  
07-ML-1816 RGK (FFM)

Case No.: 07-ML-1816 RGK (FFM)

**DISCOVERY SPECIAL MASTER'S  
ORDER NO. 4: JOINT MOTION RE  
EXPERT DISCOVERY (Hrg.  
11/7/07)**

18 On November 7, 2007, the Discovery Special Master heard the parties Joint Motion re  
19 Expert Discovery. Counsel for all affected parties were present. Having considered the  
20 arguments of the parties, and having consulted with Judge Klausner, the Discovery Special  
21 Master issues the following order to clarify the Court's prior orders concerning the close of  
22 discovery, and to provide for the timing of expert discovery.

23 On June 12, 2007, the Court issued a Minute Order that provided for the close of  
24 discovery on April 14, 2008. The Discovery Case Management Order ("DCMO"), entered on  
25 August 28, 2007, required the parties to meet and confer regarding the scheduling of expert  
26 discovery. The parties have been unable to agree on the meaning of the Court's Minute Order or  
27 how to schedule expert discovery. Plaintiff argues that the Court meant to close only fact  
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1 discovery on April 14, so that expert opinions and discovery could be based on a full factual  
 2 record. Defendants argue that the Court intended to close all discovery on April 14, and urge  
 3 that expert discovery be scheduled prior to that. Also relevant is that the Court set May 14, 2008  
 4 as the last date for filing individual summary judgment motions, which of course are likely to  
 5 involve expert opinions.

6 The Discovery Special Master has discussed the pros and cons of each position  
 7 thoroughly with Judge Klausner, who confirmed that he intended to have all discovery, both fact  
 8 and expert, closed by April 14, 2008, and that having considered all the circumstances does not  
 9 believe there is a good reason to change that date. He also confirmed that he does not intend to  
 10 alter the summary judgment filing dates.

11 Order

12 Now, therefore, good cause appearing, it is hereby ORDERED that:

13 1. All discovery, both fact and expert, shall be completed by April 14, 2008, except as  
 14 ordered by the Discovery Special Master or the Court for good cause.

15 2. Opening expert reports shall be served by February 29, 2008. Rebuttal expert reports  
 16 shall be served by March 21, 2008. Expert depositions shall be scheduled between February 29  
 17 and April 14, 2008, with priority being given to those experts whose testimony is relevant to the  
 18 summary judgment motions.

19 3. The parties shall meet and confer regarding a schedule for expert depositions, and  
 20 shall present a joint proposed schedule to the Discovery Special Master by February 22, 2008. If  
 21 they are unable to agree on a joint schedule, a conference with the Discovery Special Master will  
 22 take place on February 26, 2008 to resolve all disputes.

23 IT IS SO ORDERED.

24 Dated: November 21, 2007



By: \_\_\_\_\_

25 Martin Quinn, Discovery Special Master